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VIA ECF

The Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, 10007

Re: *Chevron Corp. v. Donziger*, No. 11 Civ. 0691 (LAK)

Dear Judge Kaplan:

I write as counsel for Chevron Corporation to provide the Court with an alternative neutral forensic expert pursuant to this Court's November 26, 2018 order. Dkt. 2134. The proposed forensic examination protocol submitted by Chevron on October 30, 2018 in response to the Court's October 18 Order requiring Steven Donziger to submit his electronic devices for forensic imaging and examination proposed that the devices be imaged by a neutral forensic expert. Dkt. 2120. As an alternative to Alix Partners, Chevron proposes LIFARS, LLC a digital forensics and cybersecurity firm with significant experience in litigation matters. Exhibit A reflects an overview of LIFARS services, and specific information about their digital forensics experience can be found at this link: <https://lifars.com/digital-forensics/>. LIFARS has cleared conflicts in this matter and is not otherwise retained by Chevron Corporation or Gibson Dunn in any related matter.

Respectfully,

/s/ Randy M. Mastro

Randy M. Mastro

RMM